

EXHIBIT E

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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 LYNNE FREEMAN,
14 Plaintiff,

15 v.

16 AMAZON.COM, INC, et al.,
17 Defendants.

Case No.: 2:23-cv-02917-MCS-MAR
Hon. Marc C. Scarsi Presiding

NOTICE OF RELATED CASES

18 *TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS*
19 *OF RECORD:*

20 LYNNE FREEMAN hereby files this Notice of Related Cases pursuant to
21 Federal Rule of Civil Procedure 83 and C.D. Cal. R. 83-1.3.1. Local Rule 83-1.3
22 states that the above captioned case, *Lynne Freeman v. Amazon.com Inc. et al.*, Case
23 No. 2:23-cv-02917-MCS-MAR (C.D. Cal.) (filed April 18, 2023), is related to the
24 following action filed and currently pending in the United States District Court for
25 the Southern District of New York: *Freeman v. Deebbs-Elkenaney et al*, Case No.
26 1:22-cv-02435-LLS-SN (“Related Action”).

27 Per Local Rule 83-1.3.1, cases may be deemed related if they appear:
28

1 (a) To arise from the same or a closely related transaction, happening or event;
2 or

3 (b) To call for determination of the same or substantially related or similar
4 questions of law and fact;

5 C.D. Cal. R. 83-1.3.1(a) – (b).

6 Here, the factual allegations and legal issues related to the copyright infringement
7 claims are all but identical. Both cases involve the same underlying claims of
8 copyright infringement, i.e., that the first four books of the bestselling young adult
9 paranormal romance *Crave* series infringe Plaintiff's *Blue Moon Rising / Masqued*
10 work. The 2022 New York action asserts those claims and other against, *inter alia*,
11 the author, agent, and publisher of the offending books whereas the present action
12 asserts those claims against a subset of retail outlets operating in this judicial district
13 which distributed and sold the offending books.

14
15
16 Dated: April 19, 2023

Respectfully submitted,
By: /s/ Stephen M. Doniger
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